

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Shawn Patterson,)	
)	
Plaintiff,)	07 C 6696
)	
vs.)	Honorable Judge
)	James Zagel
K. Sims,)	
Captain Cozalino,)	
Officer Wagner)	
)	
Defendants.)	

**MOTION TO ENLARGE THE TIME PERIOD IN WHICH
TO COMPLETE DEPOSITION**

NOW COMES Defendants', Dr. K Sims, Captain Cozalino, and Officer Wagner through their attorney, RICHARD A. DEVINE, State's Attorney of Cook County, by his Assistant State's Attorney, Michael A. Kuczwarra Jr., moves this Honorable Court to enlarge the time period in which to complete the deposition until July 31, 2008, and to vacate any and all defaults that may have b In support, defendant states:

1. Defendants' Deposition was to be completed by June 12, 2008.
2. The Defendants' Attorney scheduled the deposition of Plaintiff two times before the deadline in Sumner, IL.
3. That the undersigned attorney experienced medical problems including two surgeries and extended medical stays at the Hospital. These problems were a hindereance to travel to Sumner, IL.
4. The undersigned is also defending over twenty other civil rights cases pending in this District which require litigation responsibilities too numerous to list here.

5. The undersigned attorney is not being dilatory in bringing this motion, and apologizes to this Honorable Court for any inconvenience that this extension may cause.

WHEREFORE, the defendant respectfully requests that this Honorable Court vacate any defaults, technical or otherwise that may have been entered, and grant an enlargement of time to August 8, 2008, to depose plaintiff.

Respectfully submitted,

RICHARD A. DEVINE
State's Attorney of Cook County

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